

EXHIBIT 10

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

9 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROY E. MILLER
REGARDING WILLIAM B. ABRAMS
MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- 10 ☐ Affects PG&E Corporation
11 ☐ Affects Pacific Gas and Electric Company
12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,
14 No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 6799, 6964, 6963

15 **DECLARATION OF ROY E. MILLER**

16 Roy E. Miller declares the following pursuant to 28 U.S.C. § 1746:

- 17 1. I am an attorney and a partner at Hansen & Miller Law firm in Santa Rosa, CA.
18 2. I currently represent approximately 3,000 clients within the Watts Guerra group
19 concerning the wildfires subject to the proposed settlement.
20 3. My family and I are also clients of Watts Guerra given we lost our home and
21 possessions in the Tubbs Fire.
22 4. Since November, 2017, I've sent out regular updates to my client group. The
23 updates concerned the progress of the litigation, requests for supporting documentation and
24 encouragement given the stress all who were affected by the wildfires were going through.
25 5. The updates were generally monthly but became more frequent as the time for
26 voting began.
27
28

1 6. At no time did I tell any client of mine how they must vote. As their lawyer and a
2 fellow survivor, I did recommend they accept the settlement, but I've always emphasized this was
3 their choice and their vote.

4 7. I encouraged my clients to ask me questions via email or phone and many did so.
5 Every question asked was answered .
6

7 8. I invited every client of ours to attend telephone town halls our group held weekly
8 through the month of April plus three additional town halls in May prior to the close of the vote.

9 9. Prior to the COVID fueled shut down, we also held in-person town halls to inform
10 all of our clients about the proposed settlement.

11 10. The telephone townhalls provided settlement information, disclosures and
12 references to www.firesettlementfacts.com where all of the settlement information plus Q&A was
13 situated.
14

15 11. The telephone townhalls also featured questions asked by folks on the townhall call.
16 The questions were answered by either a member of our group or from one of the other legal groups
17 whose clients were also attending the townhall.

18 12. As set forth in Mikal Watts' declaration, many thousands of people attended these
19 townhalls.
20

21 13. None of my clients ever expressed to me they felt rushed, pressured or under
22 informed. In fact, approximately two dozen clients asked to be taken off the phone reminder lists
23 about an upcoming townhall because they made their decision and needed no further information.

24 I declare under penalty of perjury under the laws of the State of California that the forgoing
25 is true and correct and executed this 7th day of May 2020.
26

27 /s/ Roy Miller
28 Roy Miller